

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
KEITH SHAW : **VIOLATIONS:**
: **18 U.S.C. § 1951 (robbery which**
: **interferes with interstate commerce - 1**
: **count)**
: **18 U.S.C. § 924(c)(1)(use of a firearm**
: **during a crime of violence - 1 count)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, the Cricket phone store, located at 5607 North 5th Street, Philadelphia, Pennsylvania was a business engaged in interstate commerce, providing cellular telephones and accessories, containing components produced and transported from other states to the Commonwealth of Pennsylvania, and sold to residents of the Commonwealth of Pennsylvania and out of state residents.

2. On or about March 15, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

KEITH SHAW

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce by robbery, in that defendant SHAW unlawfully took and obtained approximately \$1,900 in United States currency belonging to the Cricket phone store, from an employee, against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person and property, that is, by pointing a handgun at the employee.

In violation of Title 18, United States Code, Section 1951.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 15, 2011, in the Eastern District of Pennsylvania,
defendant

KEITH SHAW

knowingly used and carried a firearm, that is, a black revolver, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery which interfered with interstate commerce, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c)(1).

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney